

Exhibit 524

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June 29, 2018

By E-MAIL

Michael N. Nemelka
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Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Mike and Peggy:

Thank you for your June 27, 2018 Letter regarding custodians. We were disappointed that notwithstanding our discussions on June 26 and 27, Plaintiffs ended up in the exact same place they started on June 26—namely a demand for 15 custodians in addition to the 17 custodians CDK already agreed to in connection with the *Authenticom* litigation.

As you know, Plaintiffs started at 27 additional CDK custodians¹ and CDK was at zero given the volume of documents it had already produced and its commitment to produce additional documents on behalf of the 17 *Authenticom* associates. Nonetheless, in an effort to resolve the parties' differences, CDK proposed to add an additional 7 custodians from various reporting groups within the company. See June 12, 2018 Letter from B. Miller to Plaintiffs' counsel. Plaintiffs countered with 20. See June 14, 2018 Letter from Plaintiffs to B. Miller, B. Ross, and L. Caseria.

In our meet-and-confer calls, CDK made clear that it believes that it has strong arguments against the inclusion of any additional custodians, but that if it would resolve this issue once and for all, it was willing to increase the number of additional custodians to include the 11 custodians identified in my June 12 letter. Plaintiffs indicated that they were no longer interested in Byron McDuffee (one of the 11) and that they thought 15 additional custodians was "the right number." We responded that CDK does not believe that this is just a numbers game and that the "right

¹ See March 25, 2018 Letter to B. Miller, A. Gulley, and B. Ross. We appreciate that the parties are of different minds as to whether Scott Herbers and Jason Bonifay should be treated as CDK or CVR custodians. For present purposes, we are categorizing both as CVR custodians as their involvement in this MDL litigation to date has centered on CVR-related issues.

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number” would be the number of custodians that would not be (even more) cumulative of those to which CDK has already agreed. To that end, although we urged Plaintiffs to consider limiting their request to the individuals identified my June 12 Letter, we said that we might be willing to consider the addition of one or two more custodians (if that would get this done) but that we were not inclined to go beyond that. Later that day, Plaintiffs nonetheless reiterated their demand for 15 custodians, identifying, for the first time, the five custodians they are seeking in addition to the June 12 ten.

Plaintiffs’ demand for 15 additional custodians is unacceptable. Setting aside Scott Herbers (who, as stated during our meet-and-confer, CDK was willing to consider including), we could spend the balance of this letter reiterating the reasons why each of the remaining 4 requested custodians are inappropriate additions, but we suspect that Plaintiffs would find those explanations as unavailing as we found what little Plaintiffs have provided in support of their request for them. Nonetheless, in a final attempt to resolve this issue before the parties have to resort to raising the matter with the Court—which will only delay resolution of this issue and discovery in general—CDK is willing to include Scott Herbers (in his CDK capacity), Michael Guentzel, and Mark Roman in addition to the previously-identified 10 from my June 12 Letter. That would bring the total number of additional custodians to 13 and CDK’s overall total to 30.²

Please let me know if we have agreement or whether we should promptly bring the issue to the Court.

Sincerely,



Britt M. Miller

cc: Mark Ryan
Matt Provance

² For the avoidance of doubt, the thirteen are: Brian MacDonald, Jim Foote, Robert Marvin, Al Neitzel, David Wrobel, Mike Joza, Josh Douglas, John Lilly, Jeffrey Barr, Trey Gerlich, Scott Herbers, Michael Guentzel, and Mark Roman.